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February 23, 2006

## BY ELECTRONIC FILING

The Honorable Gregory M. Sleet United States District Court 844 North King Street Wilmington, DE 19801

Re: Telcordia Technologies, Inc. v. Cisco Systems, Inc.,

Civil Action No. 04-876-GMS

Dear Judge Sleet:

Cisco has raised the following issue for presentation during the teleconference scheduled for February 27, 2006 at 2:00 p.m.:

Cisco respectfully requests an order confirming that the list of accused products currently in the case is the final list of accused products in the case, and Telcordia's infringement allegations will not later be expanded to include other products not previously accused of infringement.

Cisco agrees that the issue Telcordia has labeled as 1. below should be included in the telephone conference because it relates to the dispute for which the conference was originally scheduled. We are concerned that the second, unrelated issue (which we also believe is not ripe) may encroach unduly on the primary topic for the call, especially since we understand that the Court may have limited time available on Monday.

Telcordia has raised the following issues for presentation during the teleconference (each of which Telcordia believes to be ripe):

- 1. Although Telcordia has substantially narrowed its list of accused products, two disputes remain in connection with that list:
- A. Telcordia and Cisco have been unable to agree upon the language of a stipulation regarding the narrowed list of products. Telcordia respectfully submits that the stipulation should provide for the possibility that the Court could permit expansion of the list of

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products if satisfied that good cause has been shown on the basis of newly discovered information obtained during discovery.

- B. Telcordia and Cisco have also been unable to agree on whether Telcordia's designation of a "series" of products (e.g., "3600 Series") includes all products within that series. Telcordia respectfully requests an order confirming that its designation of a series of products encompasses all products within the series.
- 2. In connection with two Rule 30(b)(6) deposition notices that were served on Cisco in December 2005, Telcordia respectfully requests an order requiring that Cisco: (a) promptly designate appropriate Rule 30(b)(6) witnesses to testify as to each of 18 noticed subjects for all three of the patents-in-suit; and (b) promptly make its designated Rule 30(b)(6) witnesses available for deposition and cooperate with Telcordia in the scheduling of those and other depositions.

Respectfully,

Jack B. Blumenfeld (#1014)

Jack Blumenfeld

## JBB/bls

cc: Peter T. Dalleo, Clerk (By Hand)
John G. Day, Esquire (By Hand)
Don O. Burley, Esquire (By Fax)
Edward R. Reines, Esquire (By Fax)